

Exhibit A

COMMENTS OF MEADWESTVACO CORPORATION FOR DECEMBER 6, 2002 MEETING

MeadWestvaco Corporation representatives will not be able to attend this meeting, but provides the Distributive Collaborative ("Collaborative") the following comments. We hope our concerns and objectives can be incorporated in the final recommendations of the Collaborative.

To date the Collaborative process has not been responsive to the needs and objectives of MeadWestvaco Corporation to have streamlined interconnection for process for small cogeneration facilities up to 20 MW. There has been no positive movement from the current interconnection regulations of the Department of Telecommunications and Energy ("Department") at 220 CMR 8.00 et seq. for projects over 2 MW. In addition, some parties want to limit the application of the streamlined process to 10 MW projects. This is unacceptable. An end-user customer cogeneration project of even up to 50 MW whose primary function is to support the host facility by providing electric power and steam or other useful thermal energy for the manufacturing process is much different than a merchant generation plant of 150-500 MW whose primary function is to serve the power demands of the electric transmission grid to which it is interconnected. MeadWestvaco suggests that the streamlined interconnection regulations should include all cogeneration projects up to at least 20 MW. As MeadWestvaco suggested at the initial meeting any definition of cogeneration based on the current PURPA law and regulations must recognize the possibility of the repeal of PURPA. The current standards for a Qualified Facility should be applied even if PURPA is repealed.

The timing proposed by several parties to process interconnection applications for projects larger than 2 MW is equal to or greater than the current time periods for interconnections under 220 CMR 8.04 (2) and (3). However, it is proposed that the days be "business days" rather than calendar days under the current regulations which would effectively INCREASE processing time by 50 %. Henry Yoshimura noted at an earlier meeting of the Collaborative, the existing regulations were established to include all generation projects including very large merchant generation and time periods and thus time periods to process interconnection applications should be less for smaller projects of 20 MW or less.

The application and processing costs for projects larger than 2 MW is proposed by the utilities to be based on "actual costs." This is no improvement. Currently there are no application fees and the initial review is without cost to the project proponent. 220 CMR 8.04 (1) and (2). MeadWestvaco proposes a "Not to Exceed" processing fee for radial distribution interconnection projects of \$20,000 (less any application fee) comparable to the proposal of the DG developers. One half of the fee should be due at the start of the Impact and Facility Studies and the other half if the studies are completed in a timely fashion. This will avoid unnecessary disputes and provide an incentive for efficient processing. Any claim that such NTE fees would

create a cross-subsidy is without any factual backing. The utilities have presented no information that the studies for co-generation project interconnection studies on a radial distribution line under 20 MW has cost more than \$20,000 to date. As the Collaborative parties have agreed that the proposed regulations are to be reviewed after one year, if the NTE prices are less than the incremental costs they can be modified for the future.

Finally any ADR must be expedited. The telecom expedited process is much too slow. The process should, except in truly extraordinary circumstances be a paper presentation to the DTE or a technical expert on a panel designated by the DTE with a final decision within 45 days after filing. There could also be a 5 day attempt by the parties to resolve their differences.